## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-CR-00435-JFH

NICOLE MARIE PURKEY,

v.

Defendant.

## Motion for One-Level Reduction for Acceptance of Responsibility

The government moves to reduce the defendant's total offense level by one additional level for early acceptance of responsibility under United States Sentencing Guidelines § 3E1.1(b). In support of its motion, the Government states that the defendant has assisted authorities in the investigation and prosecution of her own misconduct by timely notifying authorities of her intention to enter a plea of guilty, thereby permitting the Government to avoid preparing for trial and permitting the Government and the Court to allocate their resources efficiently.

Accordingly, the Government asks this Court to decrease defendant's offense level by one additional level, as provided for in United States Sentencing Guideline § 3E1.1(b).

Respectfully submitted,

CLINTON J. JOHNSON UNITED STATES ATTORNEY

/s/ Eric O. Johnston

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## **Certificate of Service**

I hereby certify that on the 19th day of January, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Richard A. Mitchell *Defense Counsel* 

/s/ Eric O. Johnston

Eric O. Johnston Assistant United States Attorney